

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

Melissa Baily (Bar No. 237649)

3 melissabaily@quinnemanuel.com

James Judah (Bar No. 257112)

4 jamesjudah@quinnemanuel.com

Lindsay Cooper (Bar No. 287125)

5 lindsaycooper@quinnemanuel.com

50 California Street, 22nd Floor

6 San Francisco, California 94111-4788

Telephone: (415) 875-6600

7 Facsimile: (415) 875-6700

8 Marc Kaplan (*pro hac vice*)

marckaplan@quinnemanuel.com

9 191 N. Wacker Drive, Ste 2700

Chicago, Illinois 60606

10 Telephone: (312) 705-7400

Facsimile: (312) 705-7401

11 *Attorneys for Google LLC*

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 GOOGLE LLC,

16 Plaintiff,

17 vs.

18 SONOS, INC.,

19 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF SONOS, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (DKT. 479)**

I, Jocelyn Ma, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Sonos, Inc.’s (“Sonos”) Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) (Dkt. 479) filed in connection with Sonos, Inc.’s (“Sonos”) Motion for Summary Judgment Regarding Google’s Contract-Related Claims (“Sonos’s Motion”). If called as a witness, I could and would testify competently to the information contained herein.

3. Google seeks an order sealing the materials as listed below:

Document	Portions Sonos Sought to Be Filed Under Seal	Portions Google Seeks to Be Filed Under Seal	Designating Party
Sonos’s Motion	Portions highlighted in green	Portions highlighted in green	Google and Sonos
Exhibit 1 to Kwasizur Declaration (“Exhibit 1”)	Entire document	Entire document	Google and Sonos
Exhibit 2 to Kolker Declaration (“Exhibit 2”)	Entire document	Entire document	Google and Sonos

4. I understand that the Court analyzes sealing requests in connection with motions for summary judgment pursuant to the “compelling reasons” standard. *See, e.g., Edwards Lifesciences Corp. v. Merilife Scis. Pvt. Ltd.*, No. 19-CV-06593-HSG, 2021 WL 5233129, at *4 (N.D. Cal. Nov. 10, 2021); *Baird v. BlackRock Institutional Tr. Co., N.A.*, No. 17-CV-01892-HSG, 2021 WL 105619, at *5 (N.D. Cal. Jan. 12, 2021).

5. The portions of Sonos’s Motion highlighted in green as well as Exhibits 1 and 2 contain confidential business agreements and licensing negotiations that are not public. I understand that public disclosure of this information would harm Google’s competitive standing and its ability to negotiate future agreements by giving competitors access to Google’s highly confidential business thinking and asymmetrical information about Google’s collaboration strategies to other entities. If

1 such information were made public, I understand that Google's competitive standing would be
2 significantly harmed. Google has therefore designated this information as HIGHLY
3 CONFIDENTIAL—ATTORNEYS' EYES ONLY under the protective order (Dkt. No. 92). A less
4 restrictive alternative than sealing would not be sufficient because the information sought to be sealed
5 is Google's proprietary and confidential business information but has been utilized by Sonos in
6 support of its Motion. I also understand that this Court has previously granted sealing of the same
7 and/or similar information. *See, e.g.*, Dkt. 39.

8 I declare under penalty of perjury under the laws of the United States of America that to the
9 best of my knowledge the foregoing is true and correct. Executed on February 10, 2023, in San
10 Francisco, California.

11 DATED: February 10, 2023

12 By: /s/ Jocelyn Ma
13 Jocelyn Ma
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